

1 **Thomas P. Riley, SBN 194706**
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
3 **First Library Square**
4 **1114 Fremont Ave.**
5 **South Pasadena, CA 91030**

6 **Tel: 626-799-9797**
7 **Fax: 626-799-9795**
8 **TPRLA@att.net**

9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **J & J Sports Productions, Inc.,**

14 **Case No. 5:08-cv-00990-PVT**

15 **Plaintiff,**

16 **REQUEST TO ENTER DEFAULT**

17 **vs.**

18 **Israel Valencia Garcia, individually**
19 **and d/b/a La Copa,**

20 **Defendant.**

21 **TO: THE CLERK OF THE ABOVE-ENTITLED COURT:**

22 Plaintiff, J & J Sports Productions, Inc., hereby requests that the Clerk of the
23 above-entitled Court enter default in this matter against Defendant **Israel Valencia**
24 **Garcia, individually and d/b/a La Copa**, on the grounds that said Defendant has
25 failed to appear or otherwise respond to the Summons and Complaint within the time
26 prescribed by the Federal Rules of Civil Procedure.

27 ///

28 ///

1 Said Defendant was duly served with the Summons and Complaint, evidenced by
2 the Proof of Service on file with this Court.
3
4

5 Dated: June 18, 2008

/s/ Thomas P. Riley

6 **LAW OFFICES OF THOMAS P. RILEY, P.C.**

7 By: Thomas P. Riley

8 Attorneys for Plaintiff

9 J & J Sports Productions, Inc.
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

///

///

///

///

///

///

///

///

///

///

///

PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On June 18, 2008, I served:

REQUEST TO ENTER DEFAULT

On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Israel Valencia Garcia (Defendant)
1007 Barnes Street
Mission, TX 78572

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on June 18, 2008, at South Pasadena, California.

Dated: June 18, 2008

/s/ Terry Houston

TERRY HOUSTON

1 **Thomas P. Riley, SBN 194706**
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
3 **First Library Square**
4 **1114 Fremont Ave.**
5 **South Pasadena, CA 91030**

6 **Tel: 626-799-9797**
7 **Fax: 626-799-9795**
8 **TPRLA@att.net**

9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **J & J Sports Productions, Inc.**

14 **Case No. 5:08-cv-00990-PVT**

15 **Plaintiff,**

16 **AFFIDAVIT OF PLAINTIFF'S**
17 **COUNSEL IN SUPPORT OF**
18 **PLAINTIFF'S REQUEST TO**
19 **ENTER DEFAULT**

20 **vs.**

21 **Israel Valencia Garcia, individually**
22 **and d/b/a La Copa,**

23 **Defendant.**

24 **To: The Clerk of the above-entitled Court:**

25 I, Thomas P. Riley, declare as follows:

26 1. I am the attorney for J & J Sports Productions, Inc., in the above-entitled
27 action.

28 2. On May 28, 2008, Defendant was duly served with Summons and
Complaints and supplemental suit papers filed in this action.

3. On or about June 10, 2008, the Proof of Service, evidencing same was
filed with the Court.

PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On June 18, 2008, served:

**AFFIDAVIT OF PLAINTIFF'S COUNSEL IN SUPPORT OF
PLAINTIFF'S REQUEST TO ENTER DEFAULT**

On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Israel Valencia Garcia (Defendant)
1007 Barnes Street
Mission, TX 78572

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on June 18, 2008, at South Pasadena, California.

Dated: June 18, 2008

/s/ Terry Houston
TERRY HOUSTON